

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDREA TANTAROS,

Petitioner,

v.

FOX NEWS CHANNEL, LLC, THE ESTATE OF
ROGER AILES, WILLIAM SHINE, SUZANNE
SCOTT, DIANNE BRANDI, and IRENA BRIGANTI,

Respondents.

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DECLARATION OF PETER E. CALAMARI

I, Peter E. Calamari, an attorney admitted to practice before this Court, declare as follows:

1. I am a partner at the law firm of Quinn Emanuel Urquhart & Sullivan LLP, counsel of record for Respondent the Estate of Roger Ailes. I submit this Declaration in support of the Estate’s Motion to Dismiss the Petition in order to put before the Court certain documents that the Court may consider in deciding the Estate’s motion.

2. Attached hereto as Exhibit 1 is a true and correct copy of *In re Ailes Estate*, Case No. 50-2017-CP-003091-XXXX-MB (15th Jud’l. Cir., Fla.) (“*In re Ailes Estate*”) Dkt. 103, April 23, 2019 Order on Motion for Entry of Order Denying Motion For Rehearing and Final Order Striking Claims (“Final Order”).

3. Attached hereto as Exhibit 2 is a true and correct copy of *In re Ailes Estate*, Dkt. 12 (“Letters of Administration”).

4. Attached hereto as Exhibit 3 is a true and correct copy of *In re Ailes Estate*, Dkt. 52 (Petitioner's January 31, 2018 statement of claim).

5. Attached hereto as Exhibit 4 is a true and correct copy of *In re Ailes Estate*, Dkt. 53 (February 2, 2018 petition to strike statement of claim).

6. Attached hereto as Exhibit 5, Parts 1 and 2, is a true and correct copy of *In re Ailes Estate*, Dkt. 54 (February 21, 2018 amended statement of claim).¹

7. Attached hereto as Exhibit 6 is a true and correct copy of *In re Ailes Estate*, Dkt. 55 (February 26, 2018 petition to strike amended statement of claim).

8. Attached hereto as Exhibit 7 is a true and correct copy of *In re Ailes Estate*, Dkt. 56 (March 13, 2018 order striking statement of claim and amended statement of claim).

9. Attached hereto as Exhibit 8 is a true and correct copy of *In re Ailes Estate*, Dkt. 57 (March 22, 2018 opposition to the February 26, 2018 petition to strike the amended claim) (filed after the court ruled on the February 26, 2018 petition).

10. Attached hereto as Exhibit 9 is a true and correct copy of *In re Ailes Estate*, Dkt. 58 (March 30, 2018 motion for rehearing and reconsideration of Dkt. 56, the March 13, 2018 order striking claim and amended claim).

11. Attached hereto as Exhibit 10 is a true and correct copy of *In re Ailes Estate*, Dkt. 59 (April 6, 2018 notice of appeal of March 8, 2018 order striking Petitioner's claim and amended claim).

¹ The website for the docket of this case restricts uploaded files to a size of no greater than 10 MB's. As a result, Exhibit 5 was broken out into Parts 1 and 2, solely on account of this technical limitation.

12. Attached hereto as Exhibit 11 is a true and correct copy of *In re Ailes Estate*, Dkt. 101 (April 5, 2019 notice of special set hearing for order denying motion for rehearing and for final order striking claims).

13. Attached hereto as Exhibit 12 is a true and correct copy of the docket for *In re Ailes Estate*, Case No. 50-2017-CP-003091-XXXX-MB (15th Jud'l. Cir., Fla.).

14. Attached hereto as Exhibit 13 is a true and correct copy of the transcript of the April 16, 2019 hearing in *In re Ailes Estate*, Case No. 50-2017-CP-003091-XXXX-MB (15th Jud'l. Cir., Fla.).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 6, 2021
New York

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Peter Calamari
Peter Calamari
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
petercalamari@quinnemanuel.com

Attorney for the Estate of Roger Ailes